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January 31, 2008

The Honorable Mary Pat Thyng
U.S. District Court, District of Delaware
844 N. King Street
Wilmington, DE 19801

RE: Interim Status Report in Jackson v. Taylor, et. al., C.A. No. 05-823-***

Dear Judge Thyng:

In accordance with the August 16, 2007 Scheduling Order entered in the above-captioned matter (D.I.193), Defendants hereby submit this Interim Status Report.

Nature of the Case

This is a Section 1983 action filed by twenty-six (26) inmate Plaintiffs regarding the workplace environment at the Sussex Correctional Institute (SCI) kitchen in Georgetown, Delaware. Plaintiffs allege that, as inmate employees at SCI kitchen, they were subjected to harmful conditions from the prison ventilation system, and received inadequate training from the SCI kitchen staff. Plaintiffs are *pro se* in this matter with leave to proceed *in forma pauperis*.

Defendants maintain that conditions at the SCI kitchen were not detrimental, and that Plaintiffs received proper training as inmate kitchen employees. Accordingly, Defendants assert that Plaintiffs' constitutional rights have not been violated, and no evidence of a 42 U.S.C. §1983 claim exists.

Discovery

The parties are currently in discovery. Plaintiff George Jackson has filed numerous requests for admission, and took the Rule 31 depositions of seven (7) defendants on September 25 and 26, 2007. Defendants have served interrogatories upon Plaintiffs and initiated steps to take the depositions of two Plaintiffs, Vernon Truitt and Carl Walker. To date, the majority of Plaintiffs have not issued discovery requests to the Defendants.

The discovery cut-off date is April 1, 2008. The Defendants may seek leave of the Court to depose other Plaintiffs prior to the discovery cut-off date.

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In accordance with the Scheduling Order, all case dispositive motions, opening briefs and affidavits in support of those motions are due on or before April 28, 2008.

Matters in Issue

Defendants have no matters in issue at this time.

Thank you.

Very truly yours,

/s/ *Catherine Damavandi*

Deputy Attorney General, ID#3823
Attorney for Defendants

cc: Non-registered parties, listed below (by U.S. Mail)

Charles Blizzard
Roderick Brown
John F. Davis
Lawrence B. Dickens
Jerome Green
George A. Jackson
James Johnson
Samuel Jones
Timothy L. Malloy
Anthony Morris
Howard Parker
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Rique Reynolds
Charles B. Sanders
Darwin A. Savage
José Serpa
Kevin Spivey
Roger Thomas
Vernon Truitt
Carl Walker
Joseph White
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